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*Counsel for Petitioner*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**MAHMOUD KHALIL,**

Petitioner,

**v.**

**WILLIAM JOYCE ET AL.,**

Respondent.

Case No. 2:25-cv-01963 (MEF)

**CERTIFICATION OF MICHAEL  
K.T. TAN IN SUPPORT OF  
APPLICATION FOR ADMISSION  
PRO HAC VICE PURSUANT TO  
LOCAL CIVIL RULE 101.1**

I, Michael K.T. Tan, hereby certify the following:

1. I am an attorney at the American Civil Liberties Union Foundation (“ACLU”). I have been requested to represent Petitioner in this matter.

2. I am a member in good standing of the New York State Bar as of 2009.

3. I am also admitted to practice before the following courts:

Court	Year of Admission	Attorney Rolls Maintained By
New York State Appellate Division	2009	Supreme Court, State of New York Appellate Division, Second Department 45 Monroe Place Brooklyn, NY 11201
U.S. Court of Appeals for the First Circuit	2014	John Joseph Moakley U.S. Courthouse 1 Courthouse Way, Suite 3700 Boston, MA 02210
U.S. Court of Appeals for the Second Circuit	2020	Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007
U.S. Court of Appeals for the Third Circuit	2010	James A. Byrne United States Courthouse 601 Market Street Philadelphia, PA 19106
U.S. Court of Appeals for the Fourth Circuit	2020	Lewis F. Powell Jr. Courthouse & Annex 1100 East Main Street, Suite 501 Richmond, VA 23219
U.S. Court of Appeals for the Ninth Circuit	2010	The James R. Browning Courthouse 95 7th Street San Francisco, CA 94103

U.S. Court of Appeals for the Tenth Circuit	2014	Byron White Court House 1823 Stout Street Denver, CO 80257
U.S. Court of Appeals for the Eleventh Circuit	2011	Elbert P. Tuttle Courthouse 56 Forsyth Street, N.W. Atlanta, GA 30303
U.S. Court of Appeals for the District of Columbia Circuit	2019	U.S. Court of Appeals for the D.C. Circuit 333 Constitution Ave NW Washington, DC 20001
U.S. District Court for the Southern District of New York	2019	500 Pearl Street, New York, NY 10007
U.S. District Court for the Middle District of Georgia	2019	The William A Bootle Federal Building & US Courthouse, 475 Mulberry Street Macon, GA 31201
U.S. District Court for the Norther District of California	2012	Phillip Burton Federal Building & United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102
U.S. District Court for the Eastern District of Michigan	2013	Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd.

4. No professional disciplinary proceedings are pending against me in any jurisdiction and no professional discipline has previously been imposed on me in any jurisdiction.

5. In the event I am admitted *pro hac vice*, I agree to:

- a. Make payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) for each year in which I represent Petitioner in this matter;
  - b. Abide by the Rules of this Court, including any relevant disciplinary rules;
  - c. Notify this Court immediately of any matters affecting my standing at the Bar of any other Court; and
  - d. Have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in the United States District Court for the District of New Jersey.
6. In view of the foregoing, I respectfully request that I be admitted *pro hac vice*. Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: May 21, 2025

Respectfully Submitted,



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